

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

CAROLYN WITT, *et al.*

Plaintiffs,

v.

Civil Action No. 3:15cv00386-REP

CORELOGIC SAFERENT, LLC,

Defendant.

**DEFENDANT'S MOTION TO DISMISS
OR, IN THE ALTERNATIVE, TO TRANSFER VENUE**

Defendant, CoreLogic SafeRent, LLC, by counsel, and pursuant to Fed. R. Civ. P. 12(b)(2), 12(b)(3), 12(b)(6), and 28 U.S.C. § 1406(a), submits this Motion to Dismiss, or in the Alternative, to Transfer Venue. The reasons in support of the motion are set forth in the accompanying memorandum.

WHEREFORE, CoreLogic SafeRent, LLC respectfully requests that the Court enter an order (1) dismissing this case with prejudice with respect to Plaintiffs Henderson and Hines; (2) dismissing the case for lack of personal jurisdiction with respect to the claims of Plaintiff Moore; and (3) dismissing the remaining claims for improper venue.

CORELOGIC SAFERENT, LLC

By: /s/ Timothy J. St. George

Of Counsel

Alan D. Wingfield (VSB No. 27489)
David N. Anthony (VSB No. 31696)
Timothy J. St. George (VSB No. 77349)
TROUTMAN SANDERS LLP
1001 Haxall Point
Richmond, Virginia 23219
Telephone: (804) 697-1200
Facsimile: (804) 698-1339
alan.wingfield@troutmansanders.com
david.anthony@troutmansanders.com
tim.stgeorge@troutmansanders.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of August, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participants:

Leonard A. Bennett, Esq.
Susan M. Rotkis, Esq.
CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Blvd, Suite 1A
Newport News, VA 23601
Telephone: (757) 930-3660
Facsimile: (757) 930-3662
Email: len@clalegal.com

Counsel for Plaintiffs

Matthew J. Erausquin, Esq.
Casey S. Nash, Esq.
CONSUMER LITIGATION ASSOCIATES, P.C.
1800 Diagonal Rd
Suite 600
Alexandria, VA 22314
Telephone: (703) 273-7770
Facsimile: (888) 892-3512
Email: matt@clalegal.com
Email: casey@clalegal.com

Counsel for Plaintiffs

Dale W. Pittman, Esq.
THE LAW OFFICE OF DALE W.
PITTMAN, P.C.
The Eliza Spotswood House
112-A West Tabb St.
Petersburg, VA 23803
Telephone: (804) 861-6000
Facsimile: (804) 861-3362
Email: dale@pittmanlawoffice.com

Counsel for Plaintiffs

James Arthur Francis, Esq.
David A. Searles, Esq.
FRANCIS & MAILMAN PC
Land Title Building
100 S Broad Street, 19th Floor
Philadelphia, PA 19110
Telephone: 215-735-8600
Facsimile: 215-940-8000
Email: jfrancis@consumerlawfirm.com

Counsel for Plaintiffs

/s/ Timothy J. St. George

Timothy J. St. George
Virginia State Bar No. 77349
TROUTMAN SANDERS LLP
1001 Haxall Point
Richmond, Virginia 23219
Telephone: (804) 697-1254
Facsimile: (804) 698-6013
Email: tim.stgeorge@troutmansanders.com